

## REMARKS

### Objection to the Claims

Applicant respectfully traverses the objection of claim 1. Reconsideration is respectfully requested.

Applicant respectfully disagrees with the statement on page 10, of the Office Action that states “The phrase '**subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device**' is redundant and does not change the scope of the limitation.” Applicant respectfully submits that by following the method in a particular chronological order a new and unexpected benefit is derived. Applicant’s Original Specification on page 7, para [0020] illustrates the conventional authentication process and page 7, para [0021] explicitly describes that with Applicant’s invention “it is possible to authenticate someone without knowing the secret key.” Therefore, by “obtaining” subsequent to “issuing” and “receiving,” the service provider does not need to know the secret keys to authenticate an electronic device. It can use the “challenge response” pair to authenticate. Thus, the phrase “subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device” is not redundant.

For the above reason, Applicant respectfully requests the reconsideration of independent claim 1 and requests withdrawal of the objection.

Rejection of Claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 5,668,875 (Brown) in view of US 2003/0233546 (Blom)

Applicant respectfully traverses the rejection of claims 1-2, 4-11, and 13. Reconsideration is respectfully requested.

Malinen is directed towards a method for three-party authentication and authorization. Malinen authorizer generates a challenge using the identity and sends it to the client. In return,

the client generates a response and sends it back to the authorizer. The authorizer compares the challenge to the response to authenticate the client. See Malinen paragraph [0011]. Brown is directed towards a method for authenticating a roaming subscriber. In Brown, a subscriber receives a challenge and converts the challenge with the subscriber's secret key and authentication algorithm into an authentication response. Brown's subscriber further converts the authentication response in a form compatible with the local authentication protocol, and transmits to a local system communication unit. The challenge and response is then forwarded to the subscriber's home system for similar conversion and processing, and subscriber's response is compared against a home system generated response. See Brown col. 10 line 64 to col. 11, line 14. Blom is directed towards a challenge-response authentication procedure that includes masking of the expected response generated by an authentication center. The intermediate party also receives a user response from the user and generates a masked user response as the authentication center. In order to authenticate the user, the intermediate party then verifies that the masked user response corresponds to the masked expected response received from the authentication center. See Blom Abstract.

In contrast, Applicant independent claims 1 and 8 recite "obtaining one of the challenge response pairs associated with the electronic device subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device." As explained above, Malinen, Brown, or Blom does not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response.

Applicant respectfully disagrees with the statement on pages 3-4, of the Office Action that states "The Applicant amended the limitation in claim 1 as the following: "obtaining one of the challenge response pairs associated with the electronic device subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of response from the electronic device". This is inherent that a device can not obtain one of the challenge response pairs without getting an issuance the plurality of random challenges to the device. Malinen teaches the limitation of "obtaining one of the challenge response pairs associated with the electronic device", while Brown teaches the limitation "issuing the plurality of random challenges to the electronic device and receiving the plurality of response from the electronic

device". Therefore, the combination of Malinen and Brown teach the limitation as said set forth in claim 1. The new limitation added in claim 1 (i.e. "subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of response from the electronic device) is inherent and does not change the scope of the limitation of the previous office action rejection filed on 08/22/2007. The same argument applies for claim 8 and 14."

Applicant respectfully submits that claims 1 and 8 describe issuing some challenges, receiving corresponding responses, where each challenge and corresponding response is called a "challenge response pair." Applicant's claims further describe obtaining these "challenge response pairs" and using them to authenticate an electronic device. By following the method in a particular chronological order, the Applicant derives a new and unexpected benefit. Applicant's Original Specification on page 7, para [0020] illustrates the conventional authentication process and page 7, para [0021] explicitly states that with Applicant's invention "it is possible to authenticate someone without knowing the secret key." Therefore, by "obtaining" subsequent to "issuing" and "receiving," the service provider does not need to know the secret keys to authenticate a electronic device. It can use the "challenge response" pair to authenticate.

For the above reasons, Applicant submits that independent claims 1 and 8 are not obvious in view of the combination of Malinen, Brown, or Blom, and therefore the rejection of claims 1 and 8 under 35 USC 103(a) should be withdrawn. Applicant requests that claims 1 and 8 now be passed to allowance.

Dependent claims 2, 4-7, 9-11, and 11 depend from, and include all the limitations of independent claims 1 and 8. Therefore, Applicant respectfully requests the reconsideration of dependent claims 2, 4-7, 9-11, and 11 and requests withdrawal of the rejection.

Rejection of Claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 5,668,875 (Brown) in view of WO 00/02406 (Ekberg) and further in view of US 2003/0233546 (Blom)

Applicant respectfully traverses the rejection of claims 14-17. Reconsideration is respectfully requested.

Malinen, Brown, and Blom have been previously discussed and it has been reiterated that they do not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response. Ekberg is directed towards a method for authentication to be performed in an IP network. In Ekberg, the subscriber's authentication information containing a challenge and a response is fetched from the said mobile communications system to the IP network and authentication is carried out based on the authentication information obtained from the mobile communications system. See Ekberg Abstract. Ekberg also does not show or suggest “obtaining from an electronic device a plurality of challenge response pairs subsequent to issuance of a plurality of random challenges to the electronic device and receiving a plurality of responses from the electronic device” as recited by independent claim 14.

For the above reasons, Applicant submits that independent claim 14 is not obvious in view of the combination of Malinen, Brown, Ekberg or Blom, and therefore the rejection of claim 14 under 35 USC 103(a) should be withdrawn. Applicant requests that claim 14 now be passed to allowance.

Dependent claims 15-17 depend from, and include all the limitations of independent claim 14. Therefore, Applicant respectfully requests the reconsideration of dependent claims 15-17 and requests withdrawal of the rejection.

Rejection of Claims 1-2, 4-11, and 13 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 2005/0113067 (Marcovici) in view of US 2003/0233546 (Blom)

Applicant respectfully traverses the rejection of claims 1-2, 4-11, and 13. Reconsideration is respectfully requested.

Malinen and Blom have been previously discussed and it has been reiterated that they do not show or suggest obtaining a challenge response pair subsequent to issuing a random challenge and receiving the response. Marcovici is directed towards a method for determining a private key for a first network based on a security value associated with a second network.

Marcovici further mentions establishing a plurality of sessions including sending challenges and receiving responses between a mobile terminal and the first network based on the private key. See Marcovici Abstract and paragraph [0036]. Marcovici also does not show or suggest “obtaining one of the challenge response pairs associated with the electronic device subsequent to issuing the plurality of random challenges to the electronic device and receiving the plurality of responses from the electronic device” recited by independent claims 1 and 8.

For the above reasons, Applicant submits that independent claims 1 and 8 are not obvious in view of the combination of Malinen, Marcovici, or Blom, and therefore the rejection of claims 1 and 8 under 35 USC 103(a) should be withdrawn. Applicant requests that claims 1 and 8 now be passed to allowance.

Dependent claims 2, 4-7, 9-11, and 11 depend from, and include all the limitations of independent claims 1 and 8. Therefore, Applicant respectfully requests the reconsideration of dependent claims 2, 4-7, 9-11, and 11 and requests withdrawal of the rejection.

Rejection of Claims 14-17 under 35 U.S.C. § 103(a) as being unpatentable over US 2003/0028763 (Malinen) and US 2005/0113067 (Marcovici) in view of WO 00/02406 (Ekberg) and further in view of US 2003/0233546 (Blom)

Applicant respectfully traverses the rejection of claims 14-17. Reconsideration is respectfully requested.

Malinen, Marcovici, Ekberg, and Blom have been previously discussed and it has been reiterated that they do not show or suggest “obtaining from an electronic device a plurality of challenge response pairs subsequent to issuance of a plurality of random challenges to the electronic device and receiving a plurality of responses from the electronic device” as recited by independent claim 14.

For the above reasons, Applicant submits that independent claim 14 is not obvious in view of the combination of Malinen, Marcovici, Ekberg or Blom, and therefore the rejection of

claim 14 under 35 USC 103(a) should be withdrawn. Applicant requests that claim 14 now be passed to allowance.

Dependent claims 15-17 depend from, and include all the limitations of independent claim 14. Therefore, Applicant respectfully requests the reconsideration of dependent claims 15-17 and requests withdrawal of the rejection.

### Conclusion

Applicant respectfully requests that a timely Notice of Allowance be issued in this case. Such action is earnestly solicited by the Applicant. Should the Examiner have any questions, comments, or suggestions, the Examiner is invited to contact the Applicant's attorney or agent at the telephone number indicated below.

Please charge any fees that may be due to Deposit Account 502117, Motorola, Inc.

Respectfully submitted,

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